

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 22-cv-62051-AHS

HOWARD MICHAEL CAPLAN,

Plaintiff,

vs.

KLRP SERVICES LLC, a Florida Limited Liability
Company d/b/a LUXURY CARS OF FT.
LAUDERDALE and BRODY FAMILY
INVESTMENTS LLC, a Florida Limited Liability
Company

Defendant.

**DEFENDANT, BRODY FAMILY INVESTMENTS, LLC'S UNOPPOSED MOTION FOR
EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S COMPLAINT**

The Defendant, BRODY FAMILY INVESTMENTS, LLC, ("Brody"), through counsel and pursuant to Fed.R.Civ.Pro. Rule 6 and Southern District of Florida Local Rule 7.1(a), moves for the entry of an order extending the time for Brody to file a Response to Plaintiff's Complaint, and as grounds states:

1. Plaintiff filed his Complaint on November 3, 2022, asserting an ADA Violation claim against Defendant, Brody, as owner of the property and a tenant in the center (co-defendant KLRP Services, LLC).

2. Defendant's response to the complaint is due on or before November 28, 2022 (immediately after the Thanksgiving Holiday).

3. Counsel for Brody was recently retained to represent the company, is involved in settlement discussions with Plaintiff's attorney, and requires additional time to response to the complaint.

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4. Defendant, Brody requests an additional twenty (20) days, through and including December 19, 2022, to file its response to Plaintiff's Complaint

5. Under Federal Rule of Civil Procedure 6(b)(1)(A), a court may extend the time for an act to be done for "good cause" when the request is made before the original deadline expires.

6. This motion is not made for purposes of delay.

7. No prejudice will result if the Defendant, Brody's motion is granted.

LOCAL RULE 7.1 CERTIFICATION

8. Pursuant to Local Rule 7.1(a)(3), I hereby certify that the undersigned conferred in a good faith effort with opposing counsel, Ronald E. Stern, Esq., counsel for the Plaintiff, Howard Michael Caplan, who advised he does not oppose the relief requested in the motion.

WHEREFORE, the Defendant, BRODY FAMILY INVESTMENTS, LLC, respectfully requests entry of an Order extending the deadline for its response to Plaintiff's Complaint, together with such other and further relief as the Court deems just and proper.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished via e-service through this Circuit Court's E-Portal System this 22nd day of November 2022 to: Ronald E. Stern, Esq., ronsternlaw@gmail.com, The Advocacy Law Firm, P.A., 1250 E, Hallandale Beach Blvd., Suite 503, Hallandale Beach, FL 33009.

Respectfully submitted,

FRANK, WEINBERG & BLACK, P.L.

Attorneys for Defendant

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